

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

X-123-45678-9-AJ

**Karen Testerman, *pro se*
Merrimack County, Chairperson, NH Republican Party**

**Lynn-Diane Briggs, *pro se*
Registered NH Republican**

**Wayne Paul Saya Sr., *pro se*
Registered NH Republican**

Plaintiffs

Vs

**DAVID SCANLAN
NH SECRETARY OF STATE, et al,**

Defendants

Docket No. 23-cv-00499-JL-AJ

**PLAINTIFF “WAYNE PAUL SAYA, SR’s” MOTION FOR
PROTECTIVE ORDER GOVERNING CONFIDENTIAL
DOCUMENTS AND INFORMATION**

Now comes the Plaintiff, Wayne Paul Saya, Sr., *pro se*, and not a member of a class, in his capacity as one of three individual Plaintiffs “Plaintiff”/“Plaintiff’s” in the above-numbered and entitled action, hereby files this “Motion for Protective Order Governing Confidential Documents and Information.” The

Plaintiff acknowledges that in the course of discovery or as otherwise necessary to litigate this case, he may be required to provide sensitive, private, personal, or confidential information—particularly voting information—that may be deemed confidential or is otherwise not subject to public disclosure under New Hampshire law. Accordingly, the Plaintiff has agreed to the terms of this Protective Order which is attached as Exhibit A and believes that there is good cause for the Court to enter it as an order.

WHEREFORE, the Plaintiff asks the Court to enter as an order the Protective Order Concerning Confidential Documents and Information attached.

SWORN TO AND SUBSCRIBED UNDER PAINS & PENALTIES OF PERJURY THIS 20th DAY OF NOVEMBER, 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Wayne Paul Saya, Sr."

Wayne Paul Saya, Sr, Plaintiff, *pro se*
24 Cadogan Way
Nashua, NH 03062
Waynesaya2@gmail.com
571-220-3344

CERTIFICATE OF SERVICE

I, Wayne Paul Saya, Sr., individually *pro se*, and not being a member of a class, have caused to deliver this (1) MOTION FOR PROTECTIVE ORDER GOVERNING CONFIDENTIAL DOCUMENTS AND INFORMATION; (2) The PROTECTIVE ORDER GOVERNING CONFIDENTIAL DOCUMENTS AND INFORMATION, And (3) ATTACHMENT A—ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND, have been served upon the following parties, by way of U.S. Certified or Registered Mail, Postage Pre-Paid, to:

David Scanlan, Defendant
Secretary of State of New Hampshire
Office of the Secretary of the State House
107 North Main Street Concord, NH 03301

Chris Ager, Defendant
Chairman
N.H. Republican State Committee
10 Water St, Concord, NH 03301

Karen Testerman, Plaintiff, *pro se*
9 Stone Avenue
Franklin, New Hampshire 03235
Karen@KarenTesterman.com
603-934-7111

Lynn-Diane Briggs, Plaintiff, *pro se*
4 Golden Pond Lane
Amherst, New Hampshire 03031
Lynbdance@gmail.com
603-801-6886

SWORN TO UNDER PAINS AND PENALTIES OF PERJURY this 20th day of November, 2023.



Wayne Paul Saya, Sr, Plaintiff, *pro se*
24 Cadogan Way
Nashua, NH 03062
Waynesaya2@gmail.com
571-220-3344